

## UNITED STATES DISTRICT COURT

**FILED**for the  
Northern District of Texas**May 17, 2022**KAREN MITCHELL  
CLERK, U.S. DISTRICT  
COURT

United States of America

v.

)

Case No. 3:22-MJ-486-BK

Adedotun Hassan Adebogun

)

)

)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 21, 2016 to May 17, 2022 in the county of Dallas in the  
Northern District of Texas, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. §§ 1343, 1344,  
1349, 1543, 1956, and 1957Wire Fraud, Bank Fraud, Conspiracy, False Use of a Passport,  
and Money Laundering

This criminal complaint is based on these facts:

See attached affidavit of FBI SA Thomas Cook.

 Continued on the attached sheet.*Complainant's signature*SA Thomas Cook, FBI*Printed name and title*

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: May 17, 2022*Judge's signature*City and state: Dallas, TexasRENEE HARRIS TOLIVER, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR COMPLAINT**

I, Thomas R. Cook, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), currently assigned to the Dallas Division, duly appointed and acting according to law. I have been a Special Agent since August 2014. Prior to becoming a Special Agent, I worked for two and a half years as an intelligence analyst for the FBI on counterterrorism investigations. I was assigned to the Cyber Task Force of the Dallas Division and was responsible for conducting investigations of cyber intrusions, business email compromise, and cyber enabled criminal actors. I have received training in such areas as electronic and physical surveillance, interviewing witnesses and defendants, financial analysis, collection of evidence, and the use of confidential informants. I have also received training regarding computers and digital evidence.

2. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other agents and witnesses, and my review of records. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and warrant and does not set forth all of my knowledge about this matter.

3. This affidavit sets forth facts and suggests reasonable inferences from those facts establishing that there is probable cause to believe that, beginning on or about December 21, 2016 and continuing to the present, the defendant **Adedotun Hassan Adebogun (“Adebogun”)** did knowingly and willfully combine, conspire, confederate, and agree with other persons known and unknown to commit Wire Fraud, Bank Fraud,

Conspiracy, False Use of a Passport, and Money Laundering, in violation of 18 U.S.C. §§ 1343, 1344, 1349, 1543, 1956, and 1957.

4. On September 24, 2019, a grand jury sitting in the Northern District of Texas returned a 56-count indictment charging Benjamin Ifebajo (“Ifebajo”), Opeyemi Adeoso (“Adeoso”), and Temitope Folorunsho (“Folorunsho”) with conspiracy, wire fraud, bank fraud, money laundering, and use of false passport, in violation of 18 U.S.C. §§ 1349, 1343, 1344, 1956, 1957, and 1543 (3:19CR-493-M). All three defendants pled guilty to the offenses in the indictment. On June 5, 2021, Ifebajo was sentenced to 120 months. On July 15, 2021, Folorunsho was sentenced to 37 months. On November 18, 2021, Adeoso was sentenced to 151 months.

5. As a part of the investigation, emails have been obtained that show Adeoso, Ifebajo, Folorunsho and others were utilizing email accounts to share information about alias bank accounts they control, the names of victims, and whether their fraud schemes were successful. As a result of financial tracing, bank accounts controlled by individuals other than Adeoso, Ifebajo, and Folorunsho were discovered. **Adebogun** is one of those individuals. While the investigation remains ongoing and additional financial records are being obtained, Adebogun, utilizing his 16 known alias names, has received in excess of \$1,000,000 in fraud proceeds, and has laundered in excess of \$300,000. Adebogun is believed to have used the alias names Christian Doglas Felipe, Coujoe Efren, Darlington Kojo Mensah, Edward Kuchie, Freddie Joe Philley, Joel Collins, Kwasi Dumelo, Mark Jefferson Thomas, Martins Obiang, Michael John, Patrick Armand, Robert Effinger, Robert Shepard, Sam Leman, Samuel Williams, and Sean Mensah Joseph.

6. During the course of this investigation, records for numerous bank accounts used during the course of the scheme have been obtained and reviewed. A review of many of the bank accounts indicated a similar pattern of behavior. That is, the accounts were set up in alias names, utilizing fraudulent foreign government passports, fraudulent utility bills, and incorporation documents from the Dallas County Clerk's Office. Additionally, none of the businesses appeared to have a significant presence in the DFW area, in that the companies appear to have been recently formed and/or have no internet presence, and the individuals did not have a significant identifiable address or financial history. Shortly after the accounts were opened, the accounts either received fraud proceeds or they received cashier's checks from other accounts that had received the fraud proceeds. A review of the bank records reveals a pattern of large inflows immediately followed by outflows via cash, cashier's check, and occasionally wire transfer.

7. Some of the financial institutions maintained scanned copies of the foreign government passports used to open the bank accounts. A comparison of the photographs revealed that the same individual was pictured on the different passports. The passport information was shared with Agents from the Department of State – Diplomatic Security Service (DSS), which confirmed that there was no record of those particular individuals entering the United States using those passports. Subsequent to Adeoso's guilty plea, he spoke with investigators and revealed that the fraudulent passports were obtained from Nigeria and shipped to the United States for use in opening bank accounts. Adeoso further reviewed one of the scanned passport photos of **Adebogun** and identified the

individual as Adebogun.

8. Evidence obtained via email search warrants further corroborated **Adebogun's** connection to and use of the alias identities. For example, a search warrant was obtained for Adebogun's personal email address, adedotun\_adebogun@yahoo.com. A review of the search warrant revealed it was used by Adebogun because for example, emails from the sent folder included a soccer resume as well as Wells Fargo bank records in Adebogun's name, and emails in the Inbox included emails from a storage unit, apartment complexes, and the Texas Workforce Commission, all in Adebogun's true name. However, additional emails show Adebogun's connection to the fraudulent emails. For example, Adebogun had an email from michael.john160@yahoo.com. The forwarded email included an attachment which was a Wells Fargo bank statement for account ending in 3818 entitled Michael John. The statement documented an incoming wire transfer from victim company A in the amount of \$52,923.86 on April 11, 2019. On April 15, 2019, the victim company reported the fraud to the FBI's Internet Crime Complaint Center ("IC3").

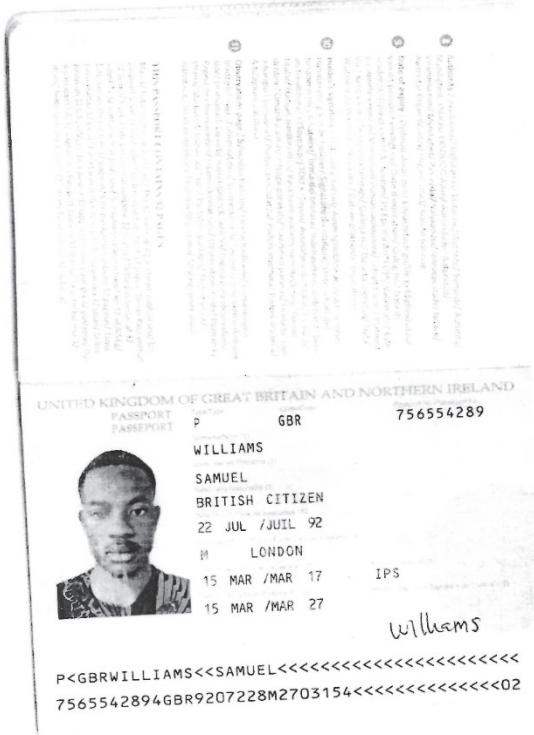
9. Examples of the documents used to support these aliases is shown below:

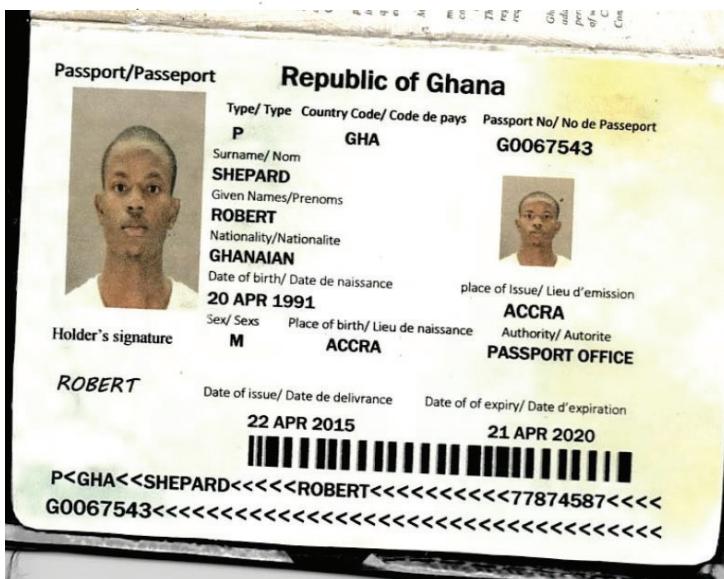
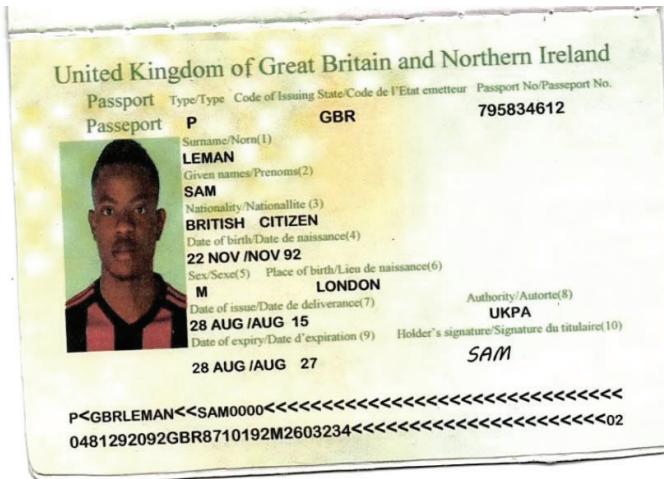
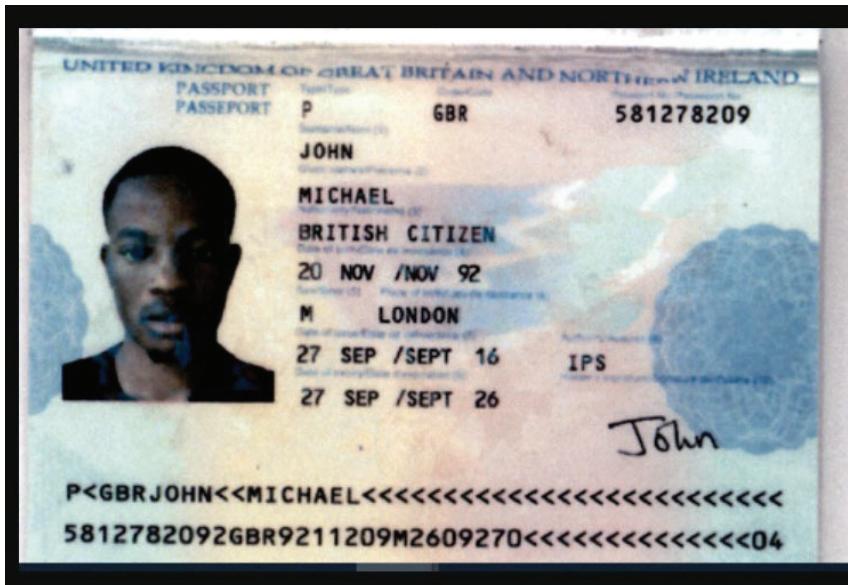
THE BEARER MUST COMPLETE THE PARTICULARS BELOW. LE TITULAIRE EST PRIÉ DE COMPLÉTER LES DÉTAILS CI-DESSOUS	
Bearer's place of permanent residence: Résidence principale du titulaire:	
Street — Rue	
Place — Lieu	
Country — Pays	Telephone — Téléphone
In case of accident or death notify: En cas d'accident ou de décès, prévire d'aviser:	
Name — Nom	
Relationship — A titre de	
Street — Rue	
Place — Lieu	
Country — Pays	Telephone — Téléphone
Signature of bearer — Signature du titulaire	

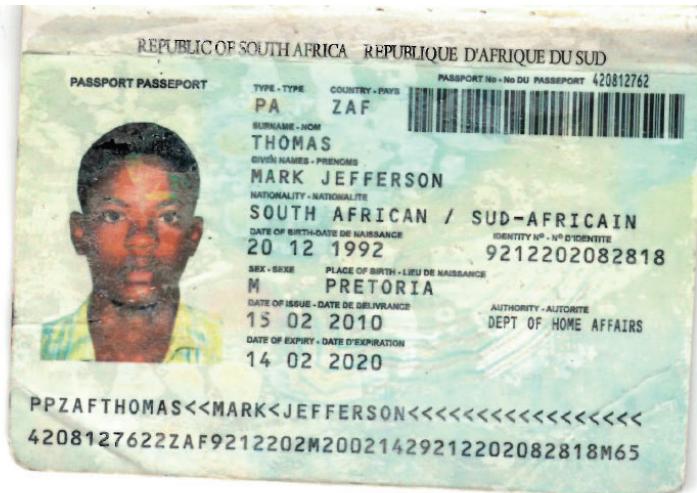
REPUBLIC OF SOUTH AFRICA REPUBLIQUE D'AFRIQUE DU SUD		
PASSPORT PASSEPORT	PASSPORT NO - N° DU PASSEPORT 437182728	
TYPE - TYPE	COUNTRY - PAYS	
PP	ZAF	
SURNAME - NOM		
Given Name(s) - Prénom(s)	CHRISTIAN DOGLAS	
NATIONALITY - NATIONALITE	SOUTH AFRICAN / SUD-AFRICAIN	
DATE OF BIRTH-DATE DE NAISSANCE	9212127672732	
SEX - SEXE	PLACE OF BIRTH - LIEU DE NAISSANCE	
M	JOHANNESBURG	
DATE OF ISSUE - DATE DE CONCESSION	DEPT OF HOME AFFAIRS	
22 05 2014		
21 05 2024		

PPZAFFILIPE<<CHRISTIAN<DOGLAS<<<<<<<<<<  
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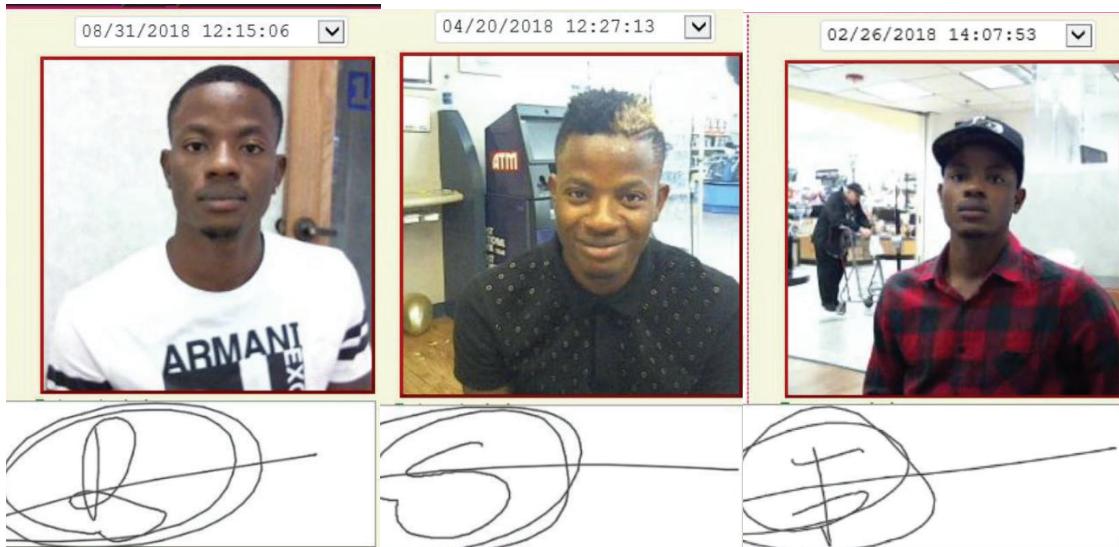
SB1283938-F1







10. In addition, First National Bank of Texas captured photographs of **Adebogun** as he opened bank accounts. Pictured below are images for accounts in the name of Robert Shepard, Sam Leman, and Freddie Philley and the signature associated with each account.



11. The accounts opened by **Adebogun** served both to directly receive fraud proceeds from victims as well as to launder funds from other co-conspirators. For

example, on May 25, 2018 the Wells Fargo bank account ending in 0103 entitled Joel Collins, received a wire transfer of \$70,816.63 from victim company B. On June 8, 2018, another wire transfer of \$17,759.48 was received from the same victim into account ending in 0103 belonging to Joel Collins. On May 29, 2018, Adeobogun, using the alias name Joel Collins wrote a check for \$75,000 from the Joel Collins account ending 0103 with a memo line “Car Sale.” In addition, Adeobogun made multiple cash withdrawals \$5,000 from the Joel Collins account ending 0103. On June 26, 2018, the victim company reported the fraud to IC3. The victim company was interviewed, confirmed the company fell victim to an email compromise of one of its vendors, and to date has not recovered any of the \$88,576.11 lost in the scheme.

12. As another example, in May 2019, a church in Wisconsin was defrauded based on a fraudulent email and wired \$510,058.97 from their bank account to a BBVA USA account in the name of MJT Ventures. Shortly thereafter, the MJT Ventures account sent a wire transfer of \$64,700 to a JPMC account ending in 8736, held by Michael John. Within 4 days, all of the funds of JPMC 8736 had been withdrawn via cash withdrawals and a wire transfer outside of the United States.

13. Thus far, the investigation has shown that between in or about December 21, 2016, and the present **Adebogun** utilized these 16 alias names to receive in excess of \$1,000,000 in fraud proceeds from victim companies throughout the United States and has laundered in excess of \$300,000 from other known and yet unidentified co-conspirators. The below chart identifies the financial institution, the alias name, the last four digits of the bank account, the amount of suspected fraud into the account, and the

suspected money laundering into the account.

#	Bank	Alias Name	Bank Account Ending	Suspected Fraud	Suspected Money Laundering
1	JPMC	Christian Felipe	9235	\$22,082.00	
2	JPMC	Christian Felipe	6938	\$-	
3	JPMC	Coujoe Efren	3387	\$46,627.00	
4	JPMC	Coujoe Efren	9861	\$-	
5	BB&T	Darlington Mensah	None	\$-	
6	JPMC	Edward Kuchie	7683	\$10,968.21	
7	BB&T	Freddie Philley	7055	\$-	\$19,000.00
8	BB&T	Freddie Philley	8009	\$-	
9	First Convenience	Freddie Philley	2784	\$5,754.98	
10	JPMC	Freddie Philley	8758	\$38,310.02	
11	Wells Fargo	Freddie Philley	4713	\$45,000.00	
12	BOFA	Joel Collins	1565	\$74,000.49	
13	Wells Fargo	Joel Collins	103	\$141,532.32	
14	BOFA	Kwasi Dumelo	3256	\$-	
15	Wells Fargo	Kwasi Dumelo	6060	\$8,429.41	
16	BBVA	Mark Jefferson Thomas	7510	\$89,008.57	
17	BB&T	Martins Obiang	8018	\$-	\$19,481.74
18	Wells Fargo	Martins Obiang	4534	\$26,586.39	
19	BBVA	Michael John	2200	\$191,204.13	\$74,109.43
20	BOFA	Michael John	2175	\$66,494.96	\$93,700.89
21	JPMC	Michael John	8736	\$-	\$64,700.00
22	Wells Fargo	Michael John	3818	\$66,047.06	
23	BOFA	Patrick Armand	379	\$8,850.95	
24	BB&T	Robert Effinger	7313	\$13,000.00	
25	First Convenience	Robert Shepard	7012	\$49,644.87	
26	First Convenience	Sam Leman	4749	\$12,715.00	
27	JPMC	Samuel Williams	3297	\$-	\$38,000.00
28	BOFA	Sean Mensah Joseph	5243	\$66,039.00	
29	BOFA	Sean Mensah Joseph	5256	\$1,779.00	
30	JPMC	Sean Mensah Joseph	1117	\$3,480.00	\$7,450.53
31	JPMC	Sean Mensah Joseph	6557	\$15,058.02	
32	Wells Fargo	Sean Mensah	4333	\$26,355.00	

		Joseph			
33	Wells Fargo	Sean Mensah Joseph	3823	\$5,312.00	
	<b>TOTAL</b>	<b>16 Aliases</b>		<b>\$1,034,279.38</b>	<b>\$316,442.59</b>

14. Based upon the aforementioned information, I submit that there is probable cause to believe that beginning on or about December 21, 2016 and continuing to the present, in the Dallas Division of the Northern District of Texas, **Adedotun Hassan Adebogun** committed the offenses of Wire Fraud, Bank Fraud, Conspiracy, False Use of a Passport, and Money Laundering, in violation of 18 U.S.C. §§ 1343, 1344, 1349, 1543, 1956, and 1957.



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THOMAS R. COOK  
Special Agent  
Federal Bureau of Investigation

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.



RENEE HARRIS TOLIVER  
United States Magistrate Judge  
Northern District of Texas  
Dallas Division